

Exhibit B-4

J.G. v. United Inn (1:20-cv-05233-SEG)**Plaintiff J.G.'s Fees Exhibit – Andersen, Tate & Carr**

The enclosed fee exhibit chart summarizes the work that Plaintiff J.G.'s legal team at Andersen, Tate & Carr (including partners, associates, and paralegals) performed in Plaintiff's case. For ease of review, the chart is broken into the following categories:

- Client meetings and intake, case preparation through discovery
- Trial preparation and trial
- Email correspondence
- Post-Judgment

| <u>CLIENT MEETINGS AND INTAKE, CASE PREPARATION THROUGH DISCOVERY</u> | | | | | |
|--|--|--|---------------------|-----------------------|-----------------------|
| Date | | Work Performed | Partner Time | Associate Time | Paralegal Time |
| 11/12/19 – 4/6/2020 | | Client Intake, Meetings, Case Research and Analysis (Note: This case was worked up only three months after the first cases in Georgia history were filed by ATC, requiring significantly more research and investigative time than run of the mill personal injury cases. Work performed includes: Two partners travel time from Duluth to Brunswick, GA on two different occasions; meetings with client, research and investigation of claims, analyzing potential defendants, case strategy meetings, preparing agreements, record requests.) | 78.5 | | |

J.G. v. United Inn (1:20-cv-05233-SEG)

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|---|--|--|-------|--|--|
| 4/6/20 – 12/28/20 | | Preparing Case for Filing (work performed includes: significant legal and investigative research; multi-hour meetings with Plaintiff and co-counsel re: facts and potential application of the law; editing and drafting complaint.) | 62.1 | | |
| 12/29/20 – 1/26/22 | | Early Filings and Motion to Dismiss (work performed includes: research and editing motion to dismiss; confer on effect of Red Roof 11th Circuit opinion; assist in client and other depositions.) | 14.6 | | |
| 1/27/22 – 12/17/24 | | Document Review, Depositions & Experts (work performed includes: preparation for mediation, review documents, i.e., depositions, affidavits, reports for King, J.G., McDowell, Shareef; Chaneyfield, Vellani, N.S., Islam, reviewed body cam footage, analyzed applicable insurance, attend mediation; preparation and conference call with Court; strategize and respond to issues raised by insurer motion to intervene; preview arguments/strategy for trial) | 87.7 | | |
| | | | 242.9 | | |
| <u>TRIAL PREPARATION AND TRIAL</u> | | | | | |
| 1/6/25 – 5/7/25 | | Pretrial preparation (work performed includes research, discussions and review of motions in limine, jury instructions, need to locate witnesses | 25.4 | | |

J.G. v. United Inn (1:20-cv-05233-SEG)

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|------------------------------------|--|---|-------|--|--|
| | | for trial, issues with vicarious liability, review and discuss demand) | | | |
| 6/9/25 – 7/6/25 | | Trial preparation (one partner lawyer averaging 6 hour per day; another performing supplemental tasks and doing research) | 125.6 | | |
| 7/7/25 – 7/11/25 | | Trial (one partner averaging 16+ hours per day; another performing in-trial research and strategy discussions) | 86.0 | | |
| | | | 237 | | |
| <u>EMAIL CORRESPONDENCE</u> | | | | | |
| | | Jonathan Tonge emails from 3/23/20 to 9/10/25 (868 emails at .1 each) | 86.8 | | |
| | | Rory Weeks emails (190 emails at .1 each) | 19.0 | | |
| | | Pat McDonough emails from 3/23/20 to 9/10/25 (868 emails at .1 each) | 86.8 | | |
| | | | 192.6 | | |
| <u>POST-JUDGMENT</u> | | | | | |
| 7/13/25 – 9/10/25 | | Post-judgment collections, negotiations, appeal preparation (work performed includes: meetings with insurance counsel re: collections; meetings re: appellate issues, Rule 54 motions for fees.) | 23.6 | | |
| | | | 23.6 | | |

J.G. v. United Inn (1:20-cv-05233-SEG)

| <u>TOTAL ATC HOURS</u> | | | | | |
|-------------------------------|--|--------------------|-------|--|--|
| | | Total Hours | 696.1 | | |

To be conservative in the fees chart:

- We are not including trial-prep work that was duplicated following the re-scheduling of the trial from April 2025 to July 2025.
- We are not including time researching and drafting motion for attorneys' fees, preparing fee exhibit, and affidavits (20+ hours).
- We are only using .1 for emails, even though there is extensive email correspondence in the case for which .1 is dramatically underinclusive. An average of .1 per email is reasonable and underinclusive.
- We are not including paralegal work on this matter.